



**EPA Region III and MDE
Municipal Separate Storm Sewer
System (MS4) Training**

Maryland Phase II MS4 Forum

**November 18–19, 2015
Laurel, Maryland**

Session 1e

MCM Focus – Pollution Prevention / Good Housekeeping for Municipal Operations





Presentation Topics

- Program Components
- Documentation
- Audit/Inspection Activities
- Common Compliance Issues
- Resources
- Q&A

Program Components

- Inventory of Facilities and Operations
- Standard Operating Procedures
- Written Pollution Prevention Plans
- PP/GH BMPs
- Infrastructure Maintenance
- Nutrient/Pesticide Management
- Facility Inspections
- Municipal Staff Education and Training



Program Requirements

- Written procedures for operations and maintenance
- Employee training
- Proper permitting for permittee-owned facilities



Common Operations Included in Program

- Road, bridge, and parking lot maintenance
- Equipment and vehicle maintenance
- Application, storage, and transport of pesticides, herbicides, and fertilizers



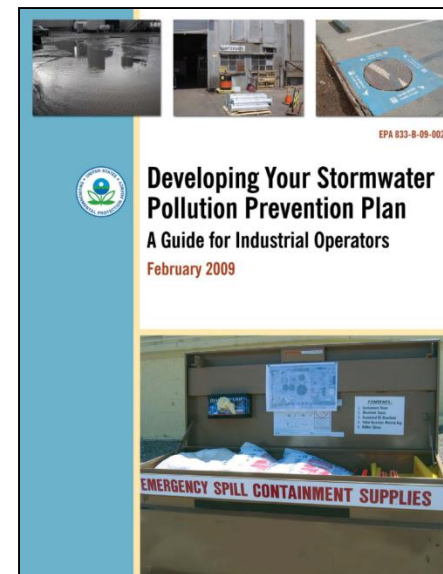
Common High-Priority Facilities

- Equipment/vehicle storage and maintenance facilities
- Public works and bus yards
- Material storage facilities
 - Stockpiles, chemical storage/disposal, salt storage
- Composting and recycling facilities
- Waste transfer facilities
- Landfills



Pollution Prevention Plan Components

- Site description and maps
- Identification of pollutant sources & potential nonstormwater discharges
- Written plan to prevent pollutant discharges and conduct oversight
 - Programmatic and physical BMPs
- Site-specific inspection and maintenance schedules
- Description of training



SWPPP Effectiveness

- Is the SWPPP updated and applicable to the site?
- Is the SWPPP easy to use and readily available?
- Does the SWPPP address all pollutant sources and discharge points?
- Are BMPs clearly identified?
- Are maintenance and inspection schedules clear and realistic?
- Have applicable staff received SWPPP-specific training?



Documentation

- Inspection records
- Maintenance records
- Detailed records of compliance issues and corrective actions
- SWPPP updates
- Permit required reports
- Training records



Audit / Inspection Activities

- ✓ Office & field-based activities
- ✓ Discussions with key personnel
 - Overview of maintenance and PP activities
 - Review of facility inventory and oversight
 - Procedures and training overview
- ✓ Records review
 - SWPPPs
 - Procedures and tools (e.g., checklists, databases)
 - Inspection, maintenance, and corrective action documentation



Field Activities

- Fixed facility site visits
- Inspection process review
- Observe maintenance operations



Common Compliance Issues

- Lack of facility / operations inventory
- Fixed facilities lack adequate controls
- Poorly defined responsibilities
- Lack of SWPPP or equivalent plan
- Stormwater BMPs not maintained
- Lack of (or non-effective) training
- Lack of detailed documentation



Paint cans left exposed



Batteries and containers left exposed to stormwater



Poor storage and spill cleanup practices



Lack of storm drain inlet protection



Lack of storm drain inlet cleaning



Wash water not contained and/or collected



Clear signage for employees?



Stormwater treatment practices in use and maintained



Stockpiles covered



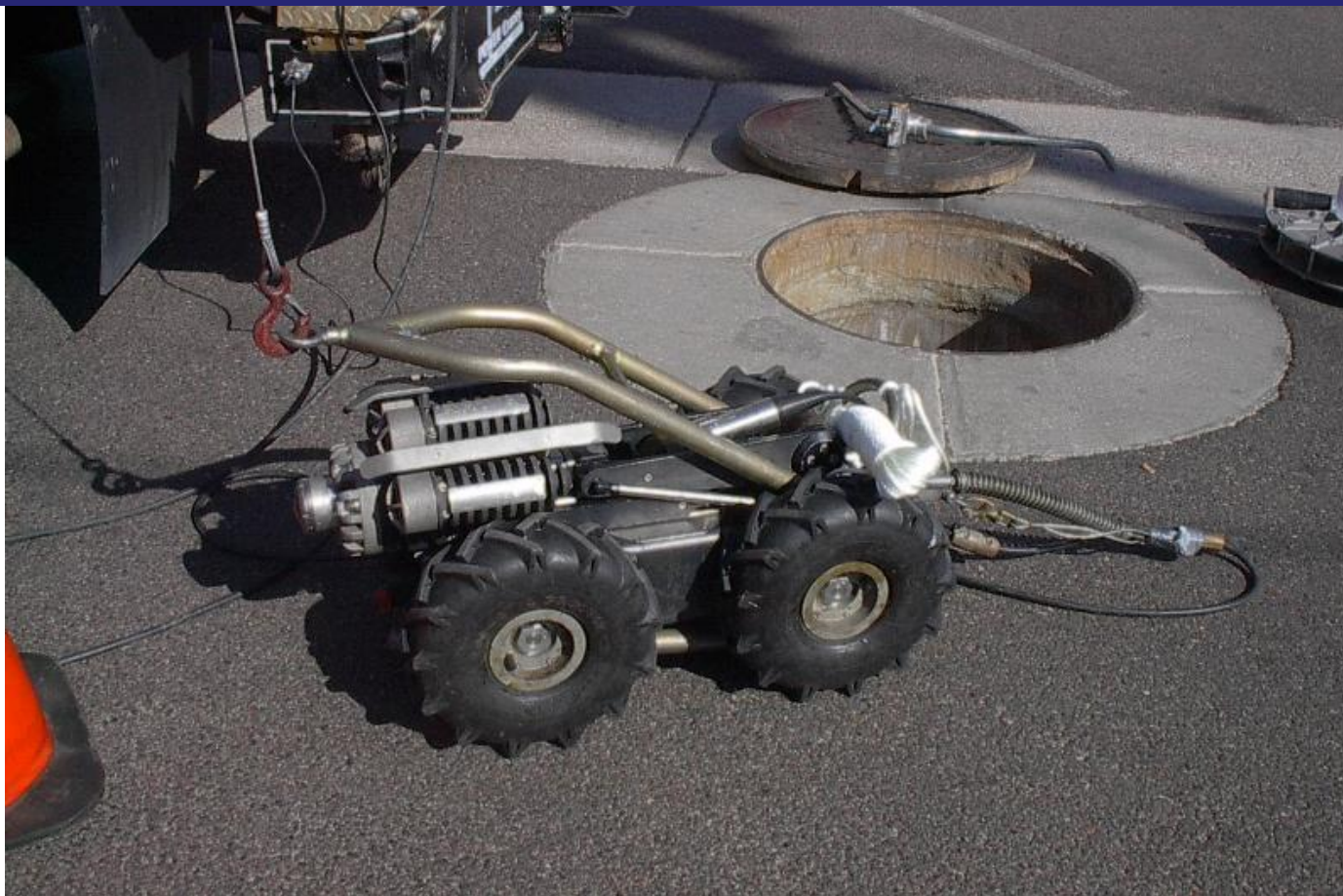
Stockpiles covered



Catch basin cleaning



Video inspection of storm drains



Questions / Discussion



12/1/2015

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Resources

- CASQA's Municipal BMP Handbook
<https://www.casqa.org/resources/bmp-handbooks>
- North Texas Council of Governments Stormwater Pollution Prevention Training Module Series
http://www.nctcog.org/envir/SEEclean/stormwater/program-areas/pollution_prevention/index.asp



Session 1f

Pollution Prevention / Good Housekeeping Program Showcase

NASA Goddard

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